Gregg A. Paradise Aaron S. Eckenthal LERNER, DAVID, LITTENBERG, KRUMHOLZ & MENTLIK, LLP 600 South Avenue West Westfield, NJ 07090-1497

Tel: 908.654.5000 Fax: 908.654.7866

Attorneys for Defendant Reflections Center for Skin and Body, PC

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

NEW REFLECTIONS PLASTIC SURGERY, :

LLC, : Civil Action No. 16-8523-FLW-TJB

.

Plaintiff, : Freda L. Wolfson, U.S.D.J.

v. : Tonianne J. Bongiovanni, U.S.M.J.

:

REFLECTIONS CENTER FOR SKIN AND

BODY, PC,

:

Defendant.

X

## STIPULATION AND ORDER

New Reflections Plastic Surgery ("Plaintiff") and Reflections Center for Skin and Body, PC ("Defendant"), (collectively "The Parties"), by and through their respective counsel, stipulate to extend the close of fact discovery. Plaintiff and Defendant have each served a subpoena on third-party witnesses and additional time is needed to schedule those depositions. Fact discovery was previously extended once and is currently scheduled to close on November 30, 2017. Therefore, The Parties respectfully request a second extension of fact discovery to January 31, 2017 so that The Parties may each complete the depositions under their respective subpoenas. The Parties thank the Court in advance for its courtesy and remain available for the telephonic status conference currently

scheduled for December 6, 2017, should the Court wish to proceed with that previously scheduled conference.

MEREDITH & KEYHANI, PLLC Attorneys for Plaintiff New Reflections Plastic Surgery LLC 125 Park Avenue, 25th Floor New York, NY 10017	LERNER, DAVID, LITTENBERG, KRUMHOLZ & MENTLIK, LLP Attorneys for Defendant Reflections Center for Skin and Body, PC 600 South Avenue West Westfield, NJ 07090-1497
By s/ Dariush Keyhani Dariush Keyhani Tel: 212.760.0098 E-mail: dkeyhani@meredithkeyhani.com	By s/ Aaron S. Eckenthal Aaron S. Eckenthal Tel: 908.654.5000 E-mail: aeckenthal@lernerdavid.com litigation@lernerdavid.com
Dated: November 30, 2017	Dated: November 30, 2017
SO ORDERED:	
Dated:	
Trenton, New Jersey	Tonianne J. Bongiovanni United States Magistrate Judge

5228065\_1.docx 2